

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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EXPRESS FREIGHT SYSTEMS INC.,

*Plaintiff,*

- against -

YMB ENTERPRISES INC.,

*Defendants.*

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**Case: 1:20-cv-00186-ARR-LB**

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**NOTICE OF CROSS MOTION**

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**PLEASE TAKE NOTICE** upon the annexed, attorney affirmation affirmed by the undersigned, and the full record of this case to date, counsel Levi Huebner, of Levi Huebner & Associates PC, cross moves on behalf of YMB ENTERPRISES INC. before the Honorable Allyne R. Ross at the United States District Court for the Eastern District of New York at 225 Cadman Plaza East, Brooklyn, NY 11201 for an order granting:

1. To hold the transcript of the deposition of Volve Mendlovic (“Volve”) dated January 18, 2021 as inadmissible; and
2. For such other and further relief as the Court deems appropriate under the circumstances in favor of this motion.

Dated: Brooklyn, NY

August 4, 2021

Levi Huebner & Associates PC

/s/ Levi Huebner

By: Levi Huebner

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*Attorneys for Defendant*